Heather M. Forrest State Bar No. 24040918 Kelly L. Cavazos State Bar No. 24059271 JACKSON WALKER L.L.P. 901 Main Street, Suite 6000 Dallas, Texas 75202 (214) 953-6000 (Telephone)

ATTORNEYS FOR AT&T MOBILITY LLC

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

IN RE:

\$ CASE NO. 09-43627
\$ (CHAPTER 7)
CLOVIS L. PRINCE, ET AL.

\$ (JOINTLY ADMINISTERED)
\$
DEBTORS.

\$ Hearing Date: May 10, 2011
Hearing Time: 2:00 p.m.

# AT&T MOBILITY LLC'S WITNESS AND EXHIBIT LIST ON MOTION FOR RELIEF FROM THE AUTOMATIC STAY TO INITIATE STATE COURT PROCEEDINGS AGAINST DEBTOR CROWN PROJECT MANAGEMENT, INC. FILED BY CMS WIRELESS, LLC

AT&T Mobility LLC ("AT&T Mobility") submits the following Witness and Exhibit List for hearing on the CMS Wireless, LLC's ("CMS") Motion for Relief From the Automatic Stay to Initiate State Court Proceedings Against Debtor Crown Project Management, Inc.:

#### **WITNESSES**

- 1. Any witness listed by any other party.
- 2. Any rebuttal witnesses.

### **EXHIBITS**

1. CMS' Motion for Relief from the Automatic Stay to Initiate State Court Proceedings Against Debtor Crown Project Management, Inc. with Exhibits 1 and 2 (Docket No. 168).

- AT&T Mobility's Objection to CMS' Motion for Relief from the Automatic Stay to Initiate State Court Proceedings Against Debtor Crown Project Management, Inc. (Docket No. 175).
- 3. Debtors' Request that CMS' Motion to Lift Stay be Denied.
- 4. Agreed Joint Motion of CMS and AT&T Mobility to (A) Pass Hearing on Lift-Stay Motion and (B) Waive 30-Day Hearing Requirement (Docket No. 182)
- 5. Order Granting Agreed Joint Motion of CMS and AT&T Mobility to (A) Pass Hearing on Lift-Stay Motion and (B) Waive 30-Day Hearing Requirement (Docket No. 183).
- 6. Proof of Claim filed by CMS Wireless, LLC in Clovis L. Prince bankruptcy case (Claim No. 9).
- 7. Proof of Claim filed by AT&T Mobility LLC in Clovis L. Prince bankruptcy case (Claim No. 8).
- 8. Proof of claim filed by CMS Wireless, LLC in C. Prince & Associates Consulting, Inc. bankruptcy case (Claim No. 6).
- 9. Proof of claim filed by AT&T Mobility LLC in C. Prince & Associates Consulting, Inc. bankruptcy case (Claim No. 13).
- 10. Proof of claim filed by CMS Wireless, LLC in Crown Project Management bankruptcy case (Claim No. 8).
- 11. Proof of claim filed by AT&T Mobility LLC in Crown Project Management bankruptcy case (Claim No. 7).

- 12. Memorandum Opinion and Orders Regarding Plaintiff's Motion for Summary Judgment in Adversary Proceeding styled *AT&T Mobility LLC v. Clovis Prince*, Adversary No. 10-4044 (Docket No. 45).
- 13. Judgment entered in Adversary Proceeding styled *AT&T Mobility LLC v. Clovis Prince*, Adversary No. 10-4044.
- Discharge of Mechanic's/Materialman's Lien recorded in Pulaski County,
   Arkansas.
- 15. Any documents filed in the above captioned and titled bankruptcy cases and any related adversary proceedings.
- 16. Any rebuttal exhibit.
- 17. Any exhibit listed by any other party.

AT&T Mobility reserves the right to introduce one or more of the exhibits listed above, and reserves the right to call witnesses and introduce additional exhibits in rebuttal or as otherwise permitted. AT&T Mobility further reserves the right to supplement this list of potential witnesses and exhibits.

DATED this 5th day of May, 2011.

## Respectfully submitted,

#### JACKSON WALKER L.L.P.

By: /s/Heather M. Forrest

Heather M. Forrest State Bar No. 24040918 Email: <u>hforrest@jw.com</u>

Kelly L. Cavazos State Bar No. 24059271 Email: <u>kcavazos@jw.com</u> 901 Main Street, Suite 6000

Dallas, Texas 75202

(214) 953-6000 (Telephone) (214) 661-6637 (Facsimile)

#### ATTORNEYS FOR AT&T MOBILITY LLC

# **CERTIFICATE OF SERVICE**

This is to certify that on this 5<sup>th</sup> day of May, 2011, a true and correct copy of AT&T Mobility LLC's Witness and Exhibit List on Motion for Relief From the Automatic Stay to Initiate State Court Proceedings Against Debtor Crown Project Management, Inc filed by CMS Wireless, LLC was served on all parties receiving electronic notice via the Court's ECF electronic mail and on the following:

Clovis L. Prince 09329-064 Fannin County Jail 2389 Silo Road Bonham, TX 75418 Michael S. Haynes Deidre B. Ruckman GARDERE WYNNE SEWELL LLP 3600 Thanksgiving Tower 1601 Elm Street Dallas, Texas 75201-4761

/s/ Heather M. Forrest

Heather M. Forrest